

January 31, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

Re: RM-10613. Petition for Rulemaking and Request for Initiation of § 403 Proceeding into Character of WorldCom, Inc. and Other Commission Licensees

Dear Ms. Dortch:

Rainbow/PUSH Coalition respectfully submits its comments in strong support of the Office of Communication of the **United Church of Christ, Inc.'s (UCC) Petition for Rulemaking and Request For Initiation of § 403 Proceeding Into Character of WorldCom, Inc. and Other Commission Licensees** (Petition). Rainbow/PUSH Coalition is a progressive organization fighting for social change. With a membership of nearly 300,000, Rainbow/PUSH is a national coalition of underserved employees, consumers, and entrepreneurs committed to securing equal protection, opportunity, and access under the law. Consistent with this mission, Rainbow/PUSH seeks to ensure equal participation in employment and ownership opportunities in the telecommunications industry. Rainbow/PUSH has an interest in preventing corruption and promoting integrity in the telecommunications industry. Therefore, Rainbow/PUSH has a substantial interest in this proceeding.

WorldCom's fraud resulted in its \$9 billion meltdown. While repugnant and unprecedented, its rapacious behavior was not unforeseeable. As early as 1998, Rainbow/PUSH opposed the then mind-boggling \$41.8 billion merger of WorldCom/MCI.¹ Rainbow/PUSH argued that such mega-mergers threatened the public airwaves that belong to the people. In almost prescient fashion Rainbow/PUSH envisioned a monolithic conglomerate controlling over 60% of the Internet backbone and thereby threatening the public's access to the streams of communications. Rainbow/PUSH saw huge job losses and price increases. Rainbow/PUSH characterized the airwaves as essential tools of modern democracy and called for the Federal Communications Commission (FCC) to protect the interest of the public's "national asset."²

¹ Speech of Rev. Jesse Jackson 30th Anniversary, Communications Week- Ohio University College of Communications, Athens, Ohio, p.6. (April 27, 1998)

² Id.

Rainbow/PUSH's applauds UCC's timely Petition and requests the FCC to conduct a Section 403 investigation into the conduct of WorldCom and to began a rulemaking proceeding that will undergo a rulemaking that would do the following:

- Adopt new standards of business conduct that eliminate opportunities and incentives to misrepresent material facts in matters before the FCC.
- Adopt rules based on the principle that the auditor must be independent both in fact and appearance similar to those required by the Securities Exchange Commission (SEC) and the Sarbanes-Oxley Act.
- Adopt rules governing the issuance of stock options to officers and directors that provide protections to shareholders and consumers similar to those used by the SEC.

UCC's Petition seeks to make those who break the law to pay. UCC's request for rulemaking will change the bad laws that allow corporate bad actors to place our underserved employees, consumers, and entrepreneurs workers in harms way. Indeed the impact of the misconduct of Commission Licensees like WorldCom, is akin to an erupting volcano that affects everything in its path. In order to stem the flow of the lava of greed, Rainbow/ PUSH urges you to approve UCC's Petition.

Respectfully Submitted,

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